

EXHIBIT B

From: [Cohen, Alex \(ATR\)](#)
To: [Herrick, Pete](#); [Marroso, David](#); [Quinn, Brian P.](#); [Murphy, Emily](#); [Petrocelli, Daniel M.](#)
Cc: [Sweeney, Bonny \(ATR\)](#); [White, Brian \(ATR\)](#); [Nicole Sarrine](#)
Subject: RE: Azoff Joint Defense / Common Interest Agreements
Date: Monday, November 4, 2024 8:59:12 PM

Pete,

I write to follow up on the below e-mail exchange you had with Brittney Dimond of the Antitrust Division in April 2024. There, you indicated that neither Mr. Azoff nor The Azoff Company Holdings LLC had “entered into a common interest/joint defense agreement with Live Nation related to the Division’s investigation of competition issues in ticketing and concert promotion services.”

Live Nation has asserted that Live Nation does have a common interest agreement with Mr. Azoff and Mr. Azoff’s company that was reached orally between Andrew Gass and Lindsey Champlin of Latham & Watkins (counsel for Live Nation) and someone from O’Melveny & Myers.

Can you please confirm that the statements you made in April are correct and/or clarify the apparent discrepancy between what you have indicated and what we have been told by Live Nation?

We would appreciate receiving your response by close of business on Wednesday, November 6, 2024.

Best,
Alex

From: Herrick, Pete <pherrick@omm.com>
Sent: Wednesday, April 24, 2024 7:38 PM
To: Dimond, Brittney (ATR) <Brittney.Dimond@usdoj.gov>; Marroso, David <dmarroso@omm.com>; Quinn, Brian P. <bquinn@omm.com>; Murphy, Emily <emurphy@omm.com>; Petrocelli, Daniel M. <dpetrocelli@omm.com>
Cc: Cohen, Alex (ATR) <Alex.Cohen@usdoj.gov>; Burg, Joshua (ATR) <Joshua.Burg@usdoj.gov>
Subject: [EXTERNAL] RE: Azoff Joint Defense / Common Interest Agreements

Hi Brittney,

The Azoff Company Holdings LLC (the entity subject to the Division’s CID) likewise has not entered into a common interest/joint defense agreement with Live Nation related to the Division’s investigation of competition issues in ticketing and concert promotion services.

Pete

From: Dimond, Brittney (ATR) <Brittney.Dimond@usdoj.gov>
Sent: Wednesday, April 24, 2024 2:08 PM
To: Herrick, Pete <pherrick@omm.com>; Marroso, David <dmarroso@omm.com>; Quinn, Brian P.

<bquinn@omm.com>; Murphy, Emily <emurphy@omm.com>; Petrocelli, Daniel M.
<dpetrocelli@omm.com>

Cc: Cohen, Alex (ATR) <Alex.Cohen@usdoj.gov>; Burg, Joshua (ATR) <Joshua.Burg@usdoj.gov>

Subject: RE: Azoff Joint Defense / Common Interest Agreements

[EXTERNAL MESSAGE]

Pete,

Thank you for confirming. For the avoidance of doubt, is the answer the same as to The Azoff Company?

Brittney

From: Herrick, Pete <pherrick@omm.com>

Sent: Tuesday, April 23, 2024 6:13 PM

To: Dimond, Brittney (ATR) <Brittney.Dimond@usdoj.gov>; Marroso, David <dmarroso@omm.com>; Quinn, Brian P. <bquinn@omm.com>; Murphy, Emily <emurphy@omm.com>; Petrocelli, Daniel M. <dpetrocelli@omm.com>

Cc: Cohen, Alex (ATR) <Alex.Cohen@usdoj.gov>; Burg, Joshua (ATR) <Joshua.Burg@usdoj.gov>

Subject: [EXTERNAL] RE: Azoff Joint Defense / Common Interest Agreements

Brittney,

Without waiver of any privileges or rights, Mr. Azoff has not entered into a common interest/joint defense agreement with Live Nation related to the Division's investigation of competition issues in ticketing and concert promotion services.

Pete

From: Dimond, Brittney (ATR) <Brittney.Dimond@usdoj.gov>

Sent: Tuesday, April 23, 2024 4:29 PM

To: Herrick, Pete <pherrick@omm.com>; Marroso, David <dmarroso@omm.com>; Quinn, Brian P. <bquinn@omm.com>; Murphy, Emily <emurphy@omm.com>; Petrocelli, Daniel M. <dpetrocelli@omm.com>

Cc: Cohen, Alex (ATR) <Alex.Cohen@usdoj.gov>; Burg, Joshua (ATR) <Joshua.Burg@usdoj.gov>

Subject: Azoff Joint Defense / Common Interest Agreements

[EXTERNAL MESSAGE]

Pete,

Thank you for the call last week. As discussed, the Division requests that Mr. Azoff disclose any common interest / joint defense agreements with Live Nation related to the Division's investigation

of competition issues in ticketing and concert promotion services. To the extent any such agreement exists, please produce the following information for each common interest / joint defense agreement:

- One copy of the agreement (or confirm that the agreement was verbal and not recorded in writing);
- Any amendments to the agreement;
- The date and duration of the agreement;
- The parties to the agreement and their counsel;
- The nature of the common interest; and
- The date the agreement terminated (or confirm that it remains in effect).

Please produce the information above no later than Wednesday, April 24.

Respectfully,
Brittney

Brittney Dimond

[She/Her/Hers]

Trial Attorney | U.S. Department of Justice | Antitrust Division

Financial Services, FinTech, and Banking Section

Work Cell: 202-894-4263

Brittney.Dimond@usdoj.gov